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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE VARIOUS GRAND JURY SUBPOENAS

12 Misc. 381 (WHP)

**RENEWED MOTION OF SUBJECT  
E TO PURGE CONTEMPT AND  
VACATE CONTEMPT CITATION**

**TO:**

Jared Lenow, AUSA  
Katherine Reilly, AUSA  
U.S. Attorney's Office  
One St. Andrew's Plaza  
New York, NY 10007

**SIR and MADAM:**

**PLEASE TAKE NOTICE** that the undersigned attorneys for Subject E hereby renew Subject E's motion before the Hon. William H. Pauley, III, U.S.D.J., on short notice, to purge the contempt judgment imposed against Subject E by Order of the Court dated January 24, 2017 (Doc. #60) and to vacate the contempt citation, having complied with the further Opinion and Order of the Court dated February 13, 2017 (Doc. #65).

**PLEASE TAKE FURTHER NOTICE** that, in support of this Motion, the undersigned relies upon a memorandum of law and Declaration of Alain Leibman in Support of Renewed

Motion to Purge, which will be filed *in camera* and under seal with the Court pursuant to the Court's permission to do so, reflected in the Court's memo endorsement of March 13, 2017 (Doc. #67), as modified by the Court's memo endorsement of March 15, 2017 (Doc. #68).

**FOX ROTHSCHILD LLP**  
Attorneys for Subject E

DATED: March 29, 2017

By:



ALAIN LEIBMAN  
Bar # AL8971

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, the within Motion was served upon by Government via ECF, and that copies of the supporting memorandum of law and Declaration, both under seal, were served upon the Government via email to the following persons:

Jared Lenow, AUSA  
Katherine Reilly, AUSA

**FOX ROTHSCHILD LLP**  
Attorneys for Subject E

DATED: March 29, 2017

By:



ALAIN LEIBMAN  
Bar # AL8971